

SONJA D. KERR (AK BAR NO. 0409051)
DISABILITY LAW CENTER OF ALASKA
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UNITED STATES DISTRICT COURT
DISTRICT OF ALASKA

N.S. by and through
his parents, R.S. and J.S.,

Case No. A05-0177 CV (TMB)

Plaintiffs,

v.

Anchorage School District,

Defendants.

Comes now, Sonja D. Kerr and being first duly sworn, deposes and states as follows:

1. I am counsel of record in this matter, and am admitted to the Bar of this Court, the State Bar of Alaska as of September, 2004. Prior to that I had been admitted to a number of courts and jurisdictions. I am an attorney experienced in special education and disability matters, having practiced in this area since the 1988-1989 school year.
2. The fees in this matter, referenced at Ex. A are \$10,881.67. My hourly rate is \$225.00, which has already been established by this Court in the underlying fees matter as reasonable. See *Docket No. 38*. The total hours reflected on the bill are 50.71 hours, which is a reasonable amount of time given the majority of the hours were in response to the Defendant's discovery motion,

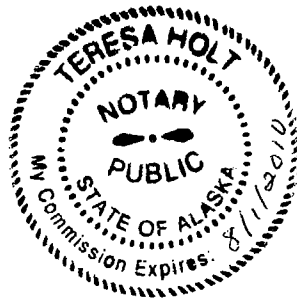
which was denied. See *Docket No. 20*. Additionally, DLC diligently attempted to avoid unnecessary litigation and expense during this matter.

DLC did not charge costs such as copying, or faxing.

Further, affiant saith not.

Teresa Holt
Subscribed and sworn to before me
this 1st day of September, 2006.

Sonja D. Kerr
Sonja D. Kerr



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Invoice submitted to:
 Jill and Rick Simmons
 7721 Evander Drive
 Anchorage AK 99518-3104

August 24, 2006

Invoice #10012

Professional Services

	<u>Hrs/Rate</u>	<u>Amount</u>
3/22/2005 Research regarding attorneys' fees	2.68 225.00/hr	602.50
Letter to opposing counsel with fee demand.	0.33 225.00/hr	75.00
3/23/2005 Phone call to client, left message to call.	0.03 225.00/hr	7.50
3/31/2005 Letter to Brad Owens regarding fees, legal research regarding Brad's letter of the 31st.	1.03 225.00/hr	232.50
7/27/2005 Preparation of pleadings, attorneys fees, final version	2.38 225.00/hr	535.25
Draft, filing of fees complaint	1.31 225.00/hr	294.13
9/5/2005 Letter to Brad regarding Rule 26 and LR 16.3	0.50 225.00/hr	112.50
9/9/2005 Review draft of R. 26 report for Court, emailing and phone messages with Brad.	0.50 225.00/hr	112.50
10/5/2005 Review of Court's pretrial order regarding discovery, dates, etc. and related.	0.77 225.00/hr	173.88
10/18/2005 Preparation of Rule 26 disclosures and sent off with cover letter to Brad.	0.50 225.00/hr	112.50

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	<u>Hrs/Rate</u>	<u>Amount</u>
10/24/2005 Research - in response to discovery requests..... issue of representation agreement...and discussed briefly with Tom D.	0.90 225.00/hr	202.50
11/2/2005 Draft response to Defendant's discovery	2.00 225.00/hr	450.00
11/15/2005 Letter to Brad Owens (dated 11/16/05) regarding discovery issues and supplementation of discovery regarding rate as set in Noon.	1.87 225.00/hr	419.81
11/18/2005 Letter in response to Brad's letter of November 18, 2005 regarding discovery and related.	0.92 225.00/hr	206.25
11/19/2005 Draft response to Brad's offer of judgment and discovery issues.	2.00 225.00/hr	450.00
11/27/2005 Legal Research on time to oppose motion to compel.	0.25 100.00/hr	25.00
11/30/2005 Meeting with Dave/Tom to discuss defendant's motions and requests for discovery	0.74 225.00/hr	167.25
Telephone call with Paul Liles regarding affidavit of support for fees petition	0.33 225.00/hr	75.00
Telephone call Jill regarding fees petition and any privileged materials and requesting that she doublecheck for same as far as emails, etc.	0.17 225.00/hr	37.50
12/1/2005 Draft letter in response to Brad's objection to our deposition of Carol and Jerry.	1.00 225.00/hr	225.25
Further legal Research on issue of depositions in attorney fees cases	1.08 225.00/hr	242.81
Draft final version of letter to Brad regarding depositions of Fleurant, Jill and myself.	0.72 225.00/hr	161.25
Research motion to compel on attorneys fees - issue of claim of privilege	0.00 225.00/hr	0.94
Draft affidavit format for local counsel to verify reasonableness of local rate and provided to Tom to pass on.	0.08 225.00/hr	17.00
Review of affidavit of support from Paul Liles	0.81 225.00/hr	181.94
Research cases cited by Defendants in their motion to compel and also review of Alaska cases on same point and draft of supplementation with privilege log.	0.50 225.00/hr	111.63
Email to Pete Wright regarding affidavit of support status.	0.17 225.00/hr	37.50

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	<u>Hrs/Rate</u>	<u>Amount</u>
12/1/2005 Email to Dorene regarding affidavit of support status.	0.08 225.00/hr	18.75
Legal Research regarding ability to take deposition of party as part of discovery in attorney fees claim.	1.02 100.00/hr	101.67
12/5/2005 Draft final version of supplemental disclosure with attorney privilege log and related.	0.50 225.00/hr	112.50
Draft letter to Brad concerning Dave's deposition	0.17 225.00/hr	38.25
Legal Research and drafting response to motion to compel	2.25 225.00/hr	506.25
Preparation of pleadings - review documents and prepare privilege logs for Plaintiffs' supplementation to defendant's first request for discovery.	0.75 100.00/hr	75.00
12/6/2005 Complete pleadings - review documents and prepare privilege logs for Plaintiffs' supplementation to defendant's first request for discovery.	2.60 100.00/hr	260.00
Additional research on response to motion to compel	1.50 225.00/hr	337.50
12/7/2005 Review, research and finalize response to motion to compel.	4.00 225.00/hr	900.00
12/11/2005 Legal Research in preparation for deposition of client and SK on 12/12/05, review of Harris case and briefs in case to 9th circuit	3.38 225.00/hr	761.25
12/12/2005 Email to Pete Wright with additional information and reminding of date regarding fees affidavit.	0.08 225.00/hr	18.75
Letter to Brad/Ray after reviewing their reply on discovery motion to compel	0.33 225.00/hr	75.00
Further review of Defendant's reply on motion to compel and work on draft of letter to counsel regarding misleading the court	0.17 225.00/hr	37.50
12/13/2005 Completed letter to counsel regarding reply on defendant's motion to compel	1.34 225.00/hr	300.75
12/15/2005 Letter to Brad with affidavits from Paul Liles, Dorene Philpot and Don McClintock	0.50 225.00/hr	112.50
Drafted combined offer of settlement for N.S. and 2 others.	0.51 225.00/hr	113.75
12/19/2005 Draft Witness List	1.53 225.00/hr	345.31

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	<u>Hrs/Rate</u>	<u>Amount</u>
1/18/2006 Letter to Brad regarding potential settlement after speaking w/Dave.	0.65 225.00/hr	145.38
1/25/2006 Telephone call to Jill left message to call.	0.02 225.00/hr	3.75
2/14/2006 Draft, proposed stipulation and settlement.	0.42 225.00/hr	95.44
Draft motion for summary judgment on fees	3.67 225.00/hr	826.56
3/21/2006 Legal Research, review of D's opposition in response to petition for attorneys' fees	0.84 225.00/hr	189.94
5/23/2006 Draft Status Report federal court	0.33 225.00/hr	75.00
5/24/2006 Draft notice of supplemental authority	0.17 225.00/hr	37.50
8/24/2006 Legal Research regarding fees for fees.	0.33 225.00/hr	74.31
For professional services rendered	<u>50.71</u>	<u>\$10,832.50</u>
Balance due		<u><u>\$10,832.50</u></u>